



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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January 28, 2019

**BY ECF**

Honorable Margo K. Brodie  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Terrel Haskins v. City of New York, et al., 15 CV 02016 (MKB)(RML)**

Your Honor:

I am an attorney in the office of Zachary W. Carter, Corporation Counsel of the City of New York, counsel for defendant Essence Jackson. I write to respectfully request an adjournment of the trial in this matter to a date and time convenient for the Court. Plaintiff's counsel, Robert Marinelli, Esq., and Michael B. Lumer, Esq., do not consent as set forth below. The basis for this request is that my co-counsel in this matter, Joanne M. McLaren, Esq., has had a sudden and unexpected medical emergency in her family and has already left the country. Ms. McLaren will be away for an unspecified period.<sup>1</sup> This matter has been handled by Ms. McLaren since its inception and she is dedicated to seeing it to its conclusion. In addition, the undersigned is commencing a trial this coming Monday, February 4, 2019, before the Honorable Vernon S. Broderick in the matter of Brock v. City of New York, 15 CV 1832 (VSB), in the Southern District. Because of the undersigned's trial and Ms. McLaren's emergency, counsel for defendants will have difficulty preparing this matter for trial on February 19, 2019.

Plaintiff does not consent to this request based on the fact that both counsel have pushed their obligations in other cases, including depositions and state court criminal matters, into February and March, and thus would find an adjournment to later in February or March difficult. Mr. Lumer also has a trial scheduled for April 1, 2019 (as does the undersigned). Despite plaintiff's lack of consent, defendant requests an adjournment of the trial in this matter.

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<sup>1</sup>Defense counsel is available to provide the Court with additional detail should the Court so request.

Defendant thanks the Court for its consideration of this matter.

Respectfully submitted,

/s/

Joshua J. Lax  
Senior Counsel  
Special Federal Litigation Division

cc: All counsel **(By ECF)**